1	RENE L. VALLADARES Federal Public Defender	
2	State Bar No. 11479 RAQUEL LAZO	
3	Assistant Federal Public Defender 411 E. Bonneville Ave., Suite 250	
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5	Fax: (702) 388-6261	
6	Attorney for STUART	
7		
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	UNITED STATES OF AMERICA,	2:12-cr-264-APG-GWF
11	Plaintiff,	UNOPPOSED MOTION AND
12	VS.	PROPOSED ORDER TO MODIFY THE CONDITIONS OF PRETRIAL RELEASE
13	RASCHID STUART,	
14	Defendant.	
15		
16	COMES NOW THE DEFENDANT, DONNIE JOHN HUBER, by and through counsel,	
17	Rene L. Valladarez, Federal Public Defender, and RAQUEL LAZO, Assistant Federal Public	
18	Defender, counsel for RASCHID STUART, that the conditions of Mr. Stuart's release be modified	
19	to include permission to travel out of the jurisdiction temporarily to San Antonio, Texas.	
20	1. Mr. Stuart requests permission to travel to San Antonio, Texas from June 27, 2013	
21	to June 30, 2013. Mr. Stuart's sole reason for the requested travel is see his father who he has not	
22	seen in a while. His father is visiting San Antonio, Texas from out of the country. The client, along	
23	with his father, will be staying with his mother.	
24	2. Mr. Stuart's pretrial officer, Jaime	Stroup, reports that Mr. Stuart has been fully
25	complaint and therefore he does not oppose this request.	
26	3. Government counsel also has no opp	position.
27	///	
28	///	

1	DATED this 19 th day of June, 2013.
2	Respectfully submitted,
3	RENE L. VALLADARES
4	RENE L. VALLADARES Federal Public Defender
5	/s/ Raquel Lazo By:
6	RAQUEL LAZO, Assistant Federal Public Defender Counsel for Raschid Stuart
7	Counsel for Raschid Stuart
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CERTIFICATE OF ELECTRONIC SERVICE The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers. That on June 19, 2013, she served an electronic copy of the above and foregoing UNOPPOSED MOTION AND PROPOSED ORDER TO MODIFY THE CONDITIONS OF **PRETRIAL RELEASE** by electronic service (ECF) to the person named below: DANIEL BOGDEN United States Attorney 333 Las Vegas Blvd. So., 5th Floor Las Vegas, Nevada 89101 WILLIAM R. REED Assistant United States Attorney 333 Las Vegas Blvd. So. 5th Floor Las Vegas, NV 89101 /s/ Maribel Bran Employee of the Federal Public Defender